

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION**

Yash Havalimane,

Plaintiff,

v.

Up-business.top, Radhika Gupta, and
John Does 1 – 20,

Defendants.

Case No. 1:25-cv-00236

Declaration of Marshal Hoda

I, Marshal Hoda, state and swear as follows.

1. My name is Marshal J. Hoda. I am of sound mind and capable of making this Declaration. I have personal knowledge of the facts stated herein. I represent the plaintiff in this matter, Yash Havalimane.

2. I personally reviewed Plaintiff's Motion for *Ex Parte* Temporary Restraining Order and Expedited Discovery, which sets out facts and offers argument as to why the Court should enter a freezing order in this case without notice to the defendants. I verify the statements set out there and urge the Court to grant the Motion for the same reasons.

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SIGNATURE PAGE

A handwritten signature in black ink, appearing to read "M Hoda", enclosed within a large, loopy circular flourish.

Marshal Hoda

May 21, 2025